

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

**LAQUITA BYRD and MARCUS BYRD,
Both individually and as Wrongful Death
Representatives of, DEION BYRD,**

PLAINTIFFS,

v.

**SHERIFF FLOYD BONNER, Jr., in his
individual capacity; CHIEF JAILER
KIRK FIELDS, in his individual capacity;
and the GOVERNMENT OF SHELBY
COUNTY, TENNESSEE,**

DEFENDANTS.

Case No. 2:24-cv-02043

**COMPLAINT FOR VIOLATIONS OF
THE CIVIL RIGHTS ACT OF 1871, 42
U.S.C. § 1983**

**JURY TRIAL DEMANDED
PURSUANT TO FED. R. CIV. PRO. 38(a)
& (b)**

**PLAINTIFF'S NOTICE OF SERVICE OF
PLAINTIFF'S CORRECTIONAL EXPERT'S REPORT**

COMES NOW Plaintiffs, by and through the undersigned counsel, and gives notice of their service of their expert report of the following individual this 17th day of June 2025:

1. Catherine A. Fontenot
Corrections Expert
1185 Americana Blvd., Apt. 2410
Zachary, LA 70791
(225) 405-2398

[Signature on following page]

Respectfully submitted,

/s/Brice M. Timmons

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of this pleading was served on all parties to this action via the Court's ECF system and an accurate and complete copy of Ms. Fontenot's CV (with built in fee schedule and testimony list), W-9, and report were transmitted to below counsel on June 17, 2025.

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/s/ Brice M. Timmons